



Chad M. Johnson, SBN: 232417
Bruce Dwiggin, SBN: 255550
25 Cadillac Dr., Suite 200
Sacramento, CA 95825
Tel: (916) 979-6100
Fax: (916) 979-6120

Attorneys for Debtors
GABRIEL L. ROSS and
FELICIA N. ROSS,

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT COURT OF CALIFORNIA

In re:

GABRIEL L. ROSS and
FELICIA N. ROSS,

Debtors.

) Case No.: 10-24542-B-7

) Chapter 7

) DCN: ADS - 01

) **MOTION FOR ORDER COMPELLING**
) **TRUSTEE TO ABANDON DEBTOR'S**
) **BUSINESS AS ASSET OF ESTATE [11**
) **USCS §§ 554(b), 721]**

) Date: May 4, 2010

) Time: 9:32 a.m.

) Courtroom: 33

) Honorable Judge Thomas C. Holman

**MOTION FOR ORDER COMPELLING TRUSTEE TO ABANDON DEBTOR'S
BUSINESS AS AN ASSET OF THE ESTATE**

1
2 Debtor GABRIEL L. ROSS, by and through his attorney of record Bruce Dwiggin, will
3 and hereby does bring a Motion to Compel Trustee to Abandon The Estate's Interest in Debtor's
4 Business ("Motion") pursuant to 11 U.S.C.S. §§554(b) and 721 of the Bankruptcy Code and Federal
5 Rule of Bankruptcy Procedure 6007(b).

6 By this motion Debtor requests that the Court enter an order compelling the Chapter 7
7 Trustee to abandon the bankruptcy estate's interest in Debtor's business on the following grounds:
8

- 9 1. Debtor's business does not possess or own any assets that might be liquidated for
10 value to benefit creditors and is therefore of inconsequential benefit to the estate,
11 and;
12 2. The retention and operation of the business by the Trustee would be burdensome
and costly to the estate and the creditors thereof.

13 Said grounds will be supported by this notice of motion, by the motion filed herewith, by the
14 pleadings and papers on file in this bankruptcy case, memorandum of points and authorities herein,
15 declaration in support of this motion and exhibits, if any, filed herewith, and by such oral and
16 documentary evidence as the Court may permit upon the hearing of this motion.
17

18 ATTORNEY DEBT SOLUTIONS, PC
19

20 Dated: March 24, 2010

By: /s/ Bruce Dwiggin
Bruce Dwiggin
Attorney for Debtors